

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re TERRORIST ATTACKS on  
SEPTEMBER 11, 2001

03 MDL 1570 (RCC)  
ECF Case

USDC SDNY  
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*This document relates to:*

*Estate of John P. O'Neill, et al v. Al Baraka Inv. & Dev. Corp., et al, 04-CV-1923 (RCC)*

STIPULATION AND ORDER  
FOR SERVICE OF PROCESS AND SETTING SCHEDULE FOR  
SALEH ABDULLAH KAMEL AND AL BARAKA INVESTMENT & DEVELOPMENT  
CORP. TO RESPOND TO  
THE SECOND AMENDED COMPLAINT

IT IS HEREBY STIPULATED AND AGREED, by and between undersigned counsel for Plaintiffs and for Defendant, Saleh Abdullah Kamel and Al Baraka Investment & Development Corp., that undersigned counsel for Saleh Abdullah Kamel and Al Baraka Investment & Development Corp. will accept service of the Second Amended Complaint on behalf of Saleh Abdullah Kamel and Al Baraka Investment & Development Corp. in the case of *Estate of John P. O'Neill, et al v. Al Baraka Inv. & Dev. Corp., et al, 04-CV-1923 (RCC)(S.D.N.Y.)*, subject to the approval of the Court, according to the following terms:

1. A copy of the summons and Second Amended Complaint, in English, shall be served via Federal Express on counsel for Saleh Abdullah Kamel and Al Baraka Investment & Development Corp. at the following address:

Martin F. Mc Mahon, Esquire  
1150 Connecticut Ave., NW  
Washington, DC 20035

2. Saleh Abdullah Kamel and Al Baraka Investment & Development Corp. shall each have sixty (60) days from the date of receipt of the Second Amended Complaint to move to dismiss or to answer the Second Amended Complaint.

3. Plaintiffs shall have sixty (60) days from the date on which it is served with Saleh Abdullah Kamel and Al Baraka Investment & Development Corp.'s response to the Complaint to serve its opposition to same or to respond to the answer.

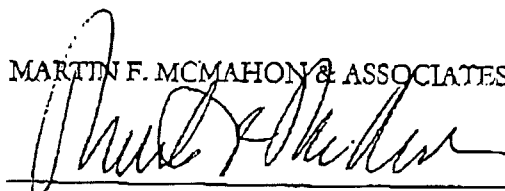
4. Saleh Abdullah Kamel and Al Baraka Investment & Development Corp. shall have thirty (30) days from the date on which Saleh Abdullah Kamel and Al Baraka Investment & Development Corp. are served with Plaintiffs' opposition to a motion to dismiss, or response to an answer, to reply to that opposition.

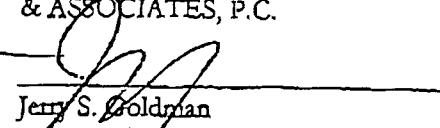
5. The foregoing schedule is without waiver of any of Saleh Abdullah Kamel and Al Baraka Investment & Development Corp.'s defenses, except that Saleh Abdullah Kamel and Al Baraka Investment & Development Corp. do not challenge the sufficiency of process or the sufficiency of Plaintiffs' service of process on Saleh Abdullah Kamel and Al Baraka Investment & Development Corp. in this case if made in compliance with Paragraphs 1-4 above. Saleh Abdullah Kamel and Al Baraka Investment & Development Corp. hereby waive all affirmative defenses, objections and arguments relating to the sufficiency of process and the sufficiency of service of process during the course of this litigation.

Respectfully submitted,

MARTIN F. MCMAHON & ASSOCIATES

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& ASSOCIATES, P.C.

  
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Dated: March \_\_, 2005

Dated: March 17, 2005


*Counsel for Defendant*  
*Saleh Abdullah Kamel and Al Baraka Investment and*

*Counsel for Plaintiffs*

*Development Corp.*

Dated: New York, New York  
April 25, 2005

SO ORDERED:

  
Richard C. Casey  
U.S.D.J.